

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

**UNITED STATES OF AMERICA,**

*Plaintiff,*

**v.**

**\$470,558.94 SEIZED FROM PLATTE  
VALLEY BANK ACCOUNT NO.  
XX2121 IN THE NAME OF ZIESON  
CONSTRUCTION COMPANY LLC, *et al.*,**

*Defendants.*

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**MLT INVESTMENTS LLC  
MATTHEW L. TORGESON**

*Claimants.*

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**Case No. 18-06112-CV-SJ-ODS**

**VERIFIED CLAIM OF INTEREST OF MLT  
INVESTMENTS LLC AND MATTHEW L. TORGESON**

1. Pursuant to Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, Claimants MLT Investments LLC and Matthew L. Torgeson, hereby file this verified claim and assert their interests and rights in the following Defendants *in rem* in this action, as identified in the Complaint for Forfeiture in Rem:

- a. The defendant \$470,558.94 seized from Platte Valley Bank Account Number ending in 2121 in the name of Zieson Construction Company LLC;
- b. The defendant \$1,000,000.00 seized from Platte Valley Bank Account Number ending in 2022 in the name of Zieson Construction Company LLC;

c. The defendant \$370,536.32 seized from CoreFirst Bank & Trust Account Number ending in 1454 in the name of Zieson Construction Company LLC.

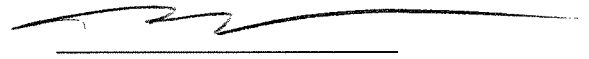
2. Claimant MLT Investments LLC, is a Kansas limited liability company in good standing. Claimant Matthew L. Torgeson is a United States citizen and resident of the State of Kansas. Matthew L. Torgeson is a governing person of MLT Investments LLC.

3. Claimants MLT Investments LLC and Matthew L. Torgeson respectfully assert a claim to, and a legally cognizable interest in, the assets listed above up to and including the amount of \$1,217,000.00, which are amounts owed to MLT Investments LLC by Zieson Construction Company LLC. By his verified signature below, Claimant contests the forfeiture of these assets on behalf of MLT Investments LLC and on behalf of his personal interests in MLT Investments LLC up to the amount of \$1,217,000.00.

**VERIFICATION**

I, Matthew L. Torgeson individually and on behalf of MLT Investments LLC, hereby declare that I have read the foregoing claim. I verify and declare, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief. This verification is made under penalty of perjury.

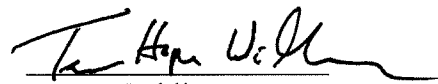
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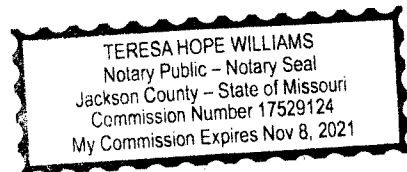
  
Matthew L. Torgeson

STATE OF MISSOURI                    )  
  ) ss.  
COUNTY OF JACKSON                )

Subscribed and sworn to before me, in my presence, this 27 day of August, 2018, a Notary Public, in and for the County of Jackson, State of Missouri.

Seal:

  
Notary Public



Respectfully submitted,

GADDY LAW LLC

By: /s/ W. Brian Gaddy  
W. BRIAN GADDY #42701  
600 Broadway Blvd., Ste. 670  
Kansas City, MO 64105  
Tel: (816) 221-8989  
Fax: (816) 945-6340  
Email: bgaddy@gaddylawllc.com  
***Counsel for Claimant Torgeson and  
MLT Investments LLC***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 28<sup>th</sup> day of August, 2018, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record, including the following:

Stacey Perkins Rock  
Assistant United States Attorney  
U.S. Attorney's Office  
400 E. 9<sup>th</sup> St, Ste. 5510  
Kansas City, MO 64106  
***Attorney for the United States***

/s/ W. Brian Gaddy  
***Counsel for Claimant Torgeson and  
MLT Investments LLC***